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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

-and-

PACIFIC GAS AND ELECTRIC  
COMPANY,

Reorganized Debtors,

Case No. 19-30088 (DM)  
Chapter 11  
(Lead Case)  
(Jointly Administered)

**DECLARATION OF THOMAS  
MELONE IN SUPPORT OF  
OPPOSITION TO REORGANIZED  
DEBTORS' ONE HUNDRED EIGHTH  
OBJECTION TO CLAIMS (PURPA  
CLAIMS) BY WINDING CREEK  
SOLAR LLC, FOOTHILL SOLAR LLC,  
HOLLISTER SOLAR LLC,  
KETTLEMAN SOLAR LLC, VINTNER  
SOLAR LLC, BEAR CREEK SOLAR  
LLC, and ALLCO RENEWABLE  
ENERGY LIMITED**

**Date: November 9, 2021  
Time: 10:00 a.m. (Pacific Time)  
Place: United States Bankruptcy Court  
Courtroom 17, 16th Floor  
San Francisco, CA 94102**

1 I, Thomas Melone, declare as follows:

2 1. I am President of Allco Renewable Energy Limited (“Allco”). I represent the  
3 Claimants Winding Creek Solar LLC, Foothill Solar LLC, Hollister Solar LLC, Kettleman Solar  
4 LLC, Vintner Solar LLC, Bear Creek Solar LLC, and Allco (collectively, the “Claimants”). The  
5 facts set forth herein are based on my personal knowledge and if called as a witness I could  
6 competently testify thereto. This declaration is being provided in support of the Claimants’  
7 Memorandum of Points and Authorities in Opposition to Reorganized Debtors’ One Hundred  
8 Eighth Objection to Claims (PURPA Claims) (Dkt. No. 11230).

9 2. I am an attorney in good standing licensed to practice law in the states of New  
10 Jersey and New York for approximately thirty-seven years. I am also an attorney in good standing  
11 licensed to practice law in the states of Massachusetts, Florida, Connecticut, Pennsylvania and  
12 Vermont. I have extensive experience as outside counsel in tax, energy and finance, including  
13 seven years practicing law with Cravath, Swaine & Moore in New York. I am currently a member  
14 of the litigation committee of the Board of Advisors of the Institute for Policy Integrity at New  
15 York University School of Law. I received my Juris Doctor with high honors from Rutgers Law  
16 School - Newark in 1983, my Master of Laws (LLM in taxation) from New York University  
17 School of Law in 1989 and my Certified Public Accountant certificate in 1980. I was a Revenue  
18 Agent for the Internal Revenue Service from 1978 to 1982.

19 3. I also have extensive experience with the business side of finance, specifically,  
20 financing utility assets that sell the energy produced to utilities under power purchase agreements.  
21 For the past twenty-five years, as President of Allco and its affiliates, I personally have been  
22 involved in arranging and structuring the financing for assets ranging from railcars, commercial  
23 aircraft, electric generation facilities, water and wastewater treatment systems, and air traffic  
24 control systems.

4. I have also testified in utility and power purchase agreement matters as an expert witness before the Massachusetts Department of Public Utilities ("DPU").

5. Attached hereto as Exhibit A is a list of Power Purchase Agreements (including Small Renewable Generator PPAs and a Section 399.20 PPAs) executed and transmitted by Claimants to PG&E between June 7, 2013 and July 22, 2013, pursuant to PG&E's AB1969 FIT applications.

6. Attached hereto as Exhibit B, is an example PPA (including a Small Renewable Generator PPA and a Section 399.20 PPA), dated June 5, 2013, pursuant to PG&E's AB1969 FIT applications, for the facility known as "Hollister 2."

7. Copies of the PPAs listed on Exhibit 1 are in the possession of Claimant, but voluminous. Accordingly, Claimants are prepared to submit all true and correct copies of such PPAs in connection with an evidentiary hearing or a state court proceeding, as this Court so directs.

I DECLARE UNDER PENALTY OF PERJURY UNDER THE LAWS OF THE STATE OF NEW JERSEY THAT THE FOREGOING IS TRUE AND CORRECT.

EXECUTED this 26th day of October, 2021, at Ho-Ho-Kus, New Jersey.

  
THOMAS MELONE